

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13:

ROSHA NICOLE DAVIS

CASE NO. 23-02655 JAW

TRUSTEE'S RESPONSE

COMES NOW, Kellie Grizzell on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee in the above cause and files this Response to the Debtor's Motion to Modify Chapter 13 Plan (Docket #39), in support thereof, would show unto the Court the following:

1. The Debtor's Motion proposes to surrender the 2007 Lexus RX to OneMain Financial Group, LLC (Claims Register #4-1).
2. The Trustee does not object.
3. The Debtor's plan payments are two (2) months in arrears and delinquent (\$3,691.32) through June 2025.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Response be received and filed, and at the hearing hereon, should an Order be entered granting the Debtor's Motion to Modify Chapter 13 Plan (Docket #39), the Trustee requests (1) the plan be modified to surrender the 2007 Lexus RX to OneMain Financial Group, LLC (Claims Register #4-1), (2) to utilize the funds to cure the current delinquency and (3) to amortize any remaining delinquency over the remaining life of the plan and amend the plan and wage order accordingly; and any other general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: June 23, 2025

Respectfully submitted,

/s/ Kellie Grizzell

Kellie Grizzell, MSB# 105681

Staff Attorney for

Standing Chapter Thirteen Trustee

Torri Parker Martin, MSB# 103938

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CERTIFICATE OF SERVICE

I, Kellie Grizzell, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Response to the following, all by U.S. Mail, postage prepaid, and/or electronic, ECF filing, to: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

Attorney for Debtor:

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DATED: June 23, 2025

/s/Kellie Grizzell

Kellie Grizzell